



SEALED

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FILED
JAN - 7 2022
U.S. MAGISTRATE JUDGE
 BY _____

7 **UNITED STATES DISTRICT COURT**
 8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff

11 vs.

12 KEVON KAMARI GILL,

13 Defendant.

Case No. **2:22-MJ-00009-VCF**

APPLICATION TO SEAL

(Under Seal)

14 The United States of America, by and through Christopher Chiou, Acting United States
 15 Attorney, and Bianca R. Pucci, Assistant United States Attorney, respectfully move this
 16 Honorable Court for an Order sealing the Complaint, Probable Cause Affidavit, Arrest
 17 Warrant, AO257, this Application, and the Court's Sealing Order, in the above-captioned
 18 matter, until such time as this Honorable Court, or another Court of competent jurisdiction,
 19 shall order otherwise.

20 Pursuant to LR IA 10-5, the Government requests that the accompanying Complaint in
 21 this case be filed under seal. *See generally*, Fed. R. Crim. P. 6(e)(4) (permitting for the sealing of
 22 an indictment); *State of Arizona v. Maypenny*, 672 F.2d 761, 765 (9th Cir. 1982) (supporting the
 23 sealing of a search warrant when there is reasonable cause to believe that providing immediate
 24 notification may have adverse results); *Matter of Sealed Affidavit(s) to Search Warrants*, 600 F.2d

1 1256 (9th Cir. 1979) (same); *In re Braughton*, 520 F.2d 765, 766 (9th Cir. 1975) (same).
2 In this case, such an order would be appropriate because the Complaint and Affidavit relate to
3 an ongoing criminal investigation into violation(s) of 18 U.S.C. §§ 922(a)(1)(A), 923(a) and
4 924(a)(1)(D) that is neither public nor known to all of the targets of the investigation and its
5 disclosure may alert the targets to the ongoing investigation and pending arrest warrant. Public
6 disclosure of the information in the Complaint might possibly jeopardize the investigation
7 because Defendant Kevon Kamari Gill is not yet in custody. Although Gill is generally aware
8 of the investigation and has spoken with investigators, he is unaware federal charges are being
9 sought against him. If he were to learn of the charges via an unsealed Complaint, he may take
10 evasive measures or destroy potential evidence, or both. Defendant Gill's knowledge that an
11 arrest warrant has been issued against him may also increase risks to law enforcement in
12 apprehending him. Accordingly, there is reason to believe that disclosure of the information
13 will jeopardize the investigation, including by giving Gill an opportunity to flee, destroy or
14 tamper with evidence, change patterns of behavior, or notify confederates.

15 DATED this 7th day of January, 2022.

16 Respectfully submitted,

17 CHRISTOPHER CHIOU
18 Acting United States Attorney

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20 BIANCA R. PUCCI
21 Assistant United States Attorney
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FILED

JAN - 7 2022

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Case No. **2:22-MJ-00009-VCF**
U.S. MAGISTRATE JUDGE
BY
ORDER TO SEAL

UNITED STATES OF AMERICA,
v.
Plaintiff,
KEVON KAMARI GILL,
Defendant.

(Under Seal)

Based on the pending Application of the Government, and good cause appearing therefore, **IT IS HEREBY ORDERED** that the Complaint, the Probable Cause Affidavit, Arrest Warrant, AO257, the Government's Application, and this Court's Sealing Order, in the above-captioned matter shall be sealed until further Order of the Court.

IT IS FURTHER ORDERED THAT the Clerk's Office for the United States District Court for the District of Nevada must release the sealed complaint to the CJA Panel Resource Attorney, who may use the information in the sealed complaint for the sole purpose of securing defense counsel in a timely manner.

IT IS FURTHER ORDERED THAT, on the day of the arrest of the first defendant in this case, the CJA Resource Attorney may provide defense counsel a copy of the sealed complaint.

DATED this 7 th day of January, 2022.


HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE